

Christine H. Chung, PLLC

November 16, 2020

Via ECF

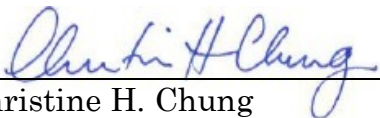
Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007-1312

Re: United States v. Victor Mones Coro and Michols Orsini Quintero
S4 19 Cr. 144 (AKH)

Dear Judge Hellerstein:

The parties have had an opportunity to confer about the briefing and argument schedule for the motions filed last week by our client Mr. Mones (for discovery sanctions) and served by our co-defendant Mr. Orsini Quintero (for discovery sanctions and bail). We respectfully and jointly propose on behalf of the defendants and the government that the government's opposition be due on November 23, 2020, that the defendants' reply be due on December 1, 2020, and that the Court schedule argument as soon thereafter as is convenient for the Court. Under this proposal, the argument date would replace the currently scheduled conference date of November 20, 2020.

Respectfully submitted,



Christine H. Chung
CHRISTINE H. CHUNG, PLLC
14 Murray Street, #236
New York, New York 10007
Telephone: 917-685-0423
christine@thechunglawoffice.com



Faith E. Gay
Jordan L. Weatherwax
SELENDY & GAY PLLC
1290 Avenue of the Americas
New York, New York 10104
Telephone: 212-390-9000
fgay@selendygay.com
jweatherwax@selendygay.com

cc: AUSA Amanda L. Houle
AUSA Samuel S. Adelsberg
Sabrina P. Shroff, Esq.
Alexei Schacht, Esq.